1 THE HONORABLE JAMAL N. WHITEHEAD 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 DAVID GOGGINS, GOGGINS BUILT NOT Case No. 2:24-cv-00257-JNW 9 BORN, LLC, and GOGGINS, LLC, STIPULATED MOTION TO EXTEND 10 Plaintiffs, BRIEFING DEADLINES TO RESPOND 11 AND REPLY TO DEFENDANT'S v. MOTION TO STAY, AND ORDER 12 AMAZON.COM, INC., NOTE ON MOTION CALENDAR: 13 April 26, 2024 Defendant. 14 15 **STIPULATION** 16 Plaintiffs David Goggins, Goggins Built Not Born, LLC, and Goggins, LLC and Defendant 17 Amazon.com, Inc., hereby STIPULATE AND AGREE to extend the deadlines for Plaintiffs to 18 respond, and for Defendants to reply to Defendants' Motion to Stay (Dkt. # 29). The parties 19 stipulate and agree to the following deadlines: 20 Deadline for Plaintiffs' Responses: May 20, 2024 21 Deadline for Defendants' Replies: June 3, 2024 22 Note on Motion Calendar: June 3, 2024 23 Plaintiffs have represented that they intend to file an Amended Complaint. The parties 24 agree not to serve discovery until after Amazon has responded to the Amended Complaint. 25 26

| TISSO STIPULATED. Dated this 26th day of April, 2024. MORGAN, LEWIS & BOCKIUS LLP By: s/Damon C. Elder Damon C. Elder Damon C. Elder WSBA No. 46754 1301 Second Avenue, Suite 3000 Seattle, WA 98101 Phone: (206) 274-6400 Email: damon.elder@morganlewis.com LATHAM & WATKINS LLP Lossica Stebbins Bina (Cal. Bar. No. 248485) Admitted pro hac vice 10250 Constellation Blvd, Suite 1100 Los Angeles, CA 90071 Telephone: (424) 653-5509 Email: jessica.stebbinsbina@lw.com Email: martinez@belplaw.com Email: martinez@belplaw.com Email: wSchultz (pro hac vice) 150 South Fifth Street, Suite 2200 Minneapolis, MN 55402-4247 Tele; (612) 336-4677 Email: WSchultz@merchantgould.com Peter A. Gergely (pro hac vice) 300 Fifth Avenue, Suite 4100 New York, New York 10110 Tel: 303.357.1646 Email: Pageply@merchantgould.com Benjamin L. Dooley (pro hac vice) 800 S. Gay Street, Suite 2150 Knoxville, Tennessee 37929 Tel: 865.380.5971 Email: Bdooley@merchantgould.com Attorneys for Plaintiff *I certify that this memorandum contains 98 words, in compliance with the Local Civil Rules. | | | |
|--|---|--|--|
| Dated this 26th day of April, 2024. | 1 | IT IS SO STIPULATED. | |
| MORGAN, LEWIS & BOCKIUS LLP BRYAN CAVE LEIGHTON PAISNER LLP | | Dated this 26th day of April, 2024. | |
| By: s/Damon C. Elder By: s/Tyler L. Farmer Tyler L. Farmer Sas A #54869 Sas A #5486 | | MORGAN, LEWIS & BOCKIUS LLP | BRYAN CAVE LEIGHTON PAISNER LLP |
| 26 | 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 | Damon C. Elder, WSBA No. 46754 1301 Second Avenue, Suite 3000 Seattle, WA 98101 Phone: (206) 274-6400 Email: damon.elder@morganlewis.com LATHAM & WATKINS LLP Jessica Stebbins Bina (Cal. Bar. No. 248485) Admitted pro hac vice 10250 Constellation Blvd, Suite 1100 Los Angeles, CA 90071 Telephone: (424) 653-5509 Email: jessica.stebbinsbina@lw.com | Tyler L. Farmer, WSBA #39912 Ariel A. Martinez, WSBA #54869 999 Third Avenue, Suite 4400 Seattle, WA 98104 Tel: (206) 623-1700 Fax: (206) 623-8717 Email: tyler.farmer@bclplaw.com Email: ariel.martinez@bclplaw.com MERCHANT & GOULD P.C. William D. Schultz (pro hac vice) 150 South Fifth Street, Suite 2200 Minneapolis, MN 55402-4247 Tel: (612) 336-4677 Email: WSchultz@merchantgould.com Peter A. Gergely (pro hac vice) 500 Fifth Avenue, Suite 4100 New York, New York 10110 Tel: 303.357.1646 Email: Pgergely@merchantgould.com Benjamin L. Dooley (pro hac vice) 800 S. Gay Street, Suite 2150 Knoxville, Tennessee 37929 Tel: 865.380.5971 Email: Bdooley@merchantgould.com |
| 11 · · · · · · · · · · · · · · · · · · | 26 | * I certify that this memorandum contains 98 words, in co | ompliance with the Local Civil Rules. |

* I certify that this memorandum contains 98 words, in compliance with the Local Civil Rule

STIPULATED MOTION TO EXTEND BRIEFING DEADLINES AND ORDER - 2 Case No. 2:24-cv-00257-JNW

ORDER IT IS SO ORDERED. DATED this 29th day of April, 2024. Jane W Jamal N. Whitehead United States District Judge Presented by:

| 1 | MORGAN, LEWIS & BOCKIUS LLP | BRYAN CAVE LEIGHTON PAISNER LLP |
|----|---|---|
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